

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 JASON GOODMAN,

Case No.: 1:18-cv-08653-VEC-SDA

5 Counter Plaintiff,

6 vs.

COUNTER CLAIM VERIFIED AMENDED
7 COMPLAINT

8 D. GEORGE SWEIGERT,

9 Counter Defendant

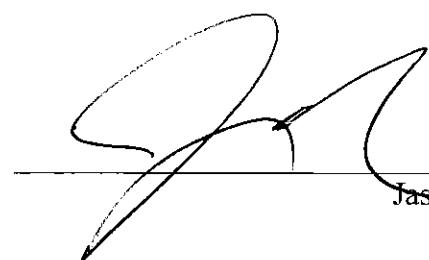
10 **COUNTER CLAIM VERIFIED AMENDED COMPLAINT**

11 Statement and Verification

12 This pleading is true to the knowledge of the undersigned, except as to matters alleged on
13 information and belief, and that as to matters the undersigned believes to be true. See N.Y.
14 C.P.L.R. 3020

15 Signed this 31th day of August 2020 under penalty of perjury

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Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
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PRO SE OFFICE

U.S. COURT OF APPEALS
FOR THE SECOND CIRCUIT
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COUNTER CLAIM VERIFIED AMENDED COMPLAINT - 1

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Counter Plaintiff, Jason Goodman, (“Goodman”) Pro Se ~~respectfully submits this~~
amended complaint to the court seeking injunctive and other relief from ongoing injuries caused
by Counter Defendant, D. George Sweigert (“Sweigert”).

6
PARTIES

- 7 1. Counter Plaintiff Jason Goodman (“Goodman”) is an individual, a citizen of New
8 York residing at 252 7th Avenue apartment 6s New York, NY 10001. Goodman is a
9 documentary filmmaker, journalist and talk show host.
- 10 2. Counter Defendant David George Sweigert (“Sweigert”) is an individual believed to
11 be a resident of California, currently utilizing a PO Box address, General Delivery
12 Rough and Ready CA 95975. Sweigert claims to be a veteran of the United States Air
13 Force and a wireless communications and information technology expert. Sweigert
14 authored the book *Ethical Hacker's Field Operations Guide: Learning the Art of*
15 *Penetration Testing* (https://www.amazon.com/gp/offer-listing/1517763096/ref=dp_olp_NEW_SINGULAR_mbc_mma?ie=UTF8&condition=NEW_SINGULAR). Penetration testing is a counter cyber warfare tactic that
16 attempts to identify a system’s weaknesses by executing a series of attacks intended
17 to penetrate the security of the target system for the purpose of compromising or
18 neutralizing the target. Sweigert is also a professional actor and maintains a portfolio
19 at (<https://casting360.com/portfolio/?view=1108109>). Sweigert authors a frequently
20 updated online blog that consists of his opinion and editorial commentary primarily
21 related to this legal action at <https://www.sdnny.info/>. Sweigert is a social media
22 personality posting regular video broadcasts on a YouTube channel he keeps hidden
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1 from the public. Viewers of Sweigert's YouTube videos must proactively search for
2 the hidden videos using the coded phrase "#SDNYORG".
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4 3. George Webb Sweigert, ("Webb") is an individual believed to be a resident of
5 Maryland and is the Counter Defendant's brother. Webb is a journalist and social
6 media personality who collaborated with Goodman creating video broadcasts for
7 approximately three months during 2017.
8
9 4. Robert David Steele ("Steele") is an individual residing in Virginia. Steele is CEO
10 of the nonprofit 501(c)(3) Earth Intelligence Network and a social media personality.
11 Steele claims to be a former CIA officer among other unverifiable claims. Steele has
12 collaborated with Webb creating broadcasts and in other matters from 2017 through
13 today. Steele initiated a civil lawsuit against Goodman in September 2017.
14
15 5. Steven S. Biss ("Biss") is an attorney emabred in Virginia with offices at 300 W
16 Main St Ste 102 Charlottesville, VA, 22903-5575. Biss represents Steele in Steele et
17 al v Goodman et al (3:17-cv-00601-MHL) an ongoing civil matter pending in the
18 Eastern District of Virginia.
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20 6. Patricia Negron ("Negron") is an individual residing in Massachusetts. To the best of
21 Counter Plaintiff's knowledge, Negron is an unemployed social media personality
22 who collaborated with Goodman creating broadcasts for approximately three months
23 in 2017. Negron was a co-Defendant in Steele et al v Goodman et al until July 2020
24 when a confidential settlement was reached between Negron and Steele dismissing all
25 charges against Negron. Negron was introduced to Goodman by Webb in or around
26 June of 2017.
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1 7. Susan Holmes, aka Susan Lutzke, aka Queen Tut (“Holmes”), is an individual
2 residing in Colorado. To the best of Counter Plaintiff’s knowledge Holmes is an
3 unemployed activist and social media personality who collaborated with Goodman
4 making broadcasts for approximately three months in 2017. Holmes is a co-
5 Defendant in Steele et al v Goodman et al. Homes contacted Goodman in June of
6 2017 as a result of her allegedly viewing a broadcast with Goodman, Webb and
7 Steele. In an unrelated matter, Holmes was arrested by Fort Collins police in
8 February 2020 for perjury and attempting to influence a public official.

9 8. Manuel Chavez III (“Chavez”), is an individual believed to reside in Nevada. To the
10 best of Counter Plaintiff’s knowledge Chavez is an unemployed social media
11 personality and self-proclaimed hacker and social engineer. For an unknown period
12 of time spanning 2017, 2018 and possibly continuing through today, Chavez has
13 collaborated in various ways, including creating online broadcasts with Sweigert and
14 Steele. Chavez is a former client of attorney Biss.

15 9. Steve Outtrim (“Outtrim”), is a citizen of New Zealand, a self-proclaimed retired
16 multimillionaire software developer and a social media personality. Outtrim has
17 collaborated with Holmes in creating a broadcast or broadcasts during 2018 during
18 which Holmes falsely alleged Goodman had inappropriate contact or transmitted
19 messages with minor children. No evidence has been offered to support the false
20 claims other than false and defamatory secondhand hearsay attributing the statements
21 to Negron. Negron did not participate in the broadcast and has via her attorney
22 denied making the claims to Holmes. Outtrim attempted to intervene in this instant
23 legal action (ECF No. 107).

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10. Marion Rapp (“Rapp”) is a citizen residing in Arizona. During 2018 and 2019 and for an unknown period of time, Rapp had official possession of US Postal Service PO Box 152 Mesa AZ, 85211. Sweigert claimed this PO Box as his official address in this legal action but was not associated with the PO Box according to the US Postal service. Official communications related to this legal matter sent to Sweigert at this address were returned as undeliverable and employees of the Post Office have confirmed Sweigert was not the owner of this PO Box.

11. Nathan Stolzman (“Stolzman”), is a citizen residing in California and a social media personality.

12. Tyroan Simpson aka Frank Bacon (“Simpson”), is believed to be a citizen of Texas a radio talk show host and a social media personality.

13. Marcus Conte (“Conte”) is an individual residing in New York and to the best of Counter Plaintiff’s knowledge is an unemployed social media personality.

14. Adam Sharp (“Sharp”) is an individual residing in Connecticut. Sharp is the President and CEO of the National Academy of Television Arts and Sciences

FACTUAL BACKGROUND

15. In October 2016, Goodman created an internet based interactive broadcast network called Crowdsource the Truth. Goodman typically produces at least one daily program six days per week including news, commentary, information and entertainment in the form of video broadcasts on YouTube and other social media platforms. Goodman offers daily programs to the public free of charge as well as several programs each week on a network available only to paid subscribers.

1 Operating Crowdsource the Truth is Goodman's full-time job and the network of paid
2 subscribers is Goodman's primary source of income.

3 **16.** In May 2017, Goodman began collaborating with the brother of Counter Defendant
4 Sweigert, George Webb Sweigert ("Webb"). Webb and Goodman made numerous
5 video broadcasts together over the course of approximately three months. Goodman
6 has never met Counter Defendant Sweigert. When viewers of Webb and Goodman's
7 broadcasts contacted Goodman via email to alert him of threatening videos that were
8 appearing on YouTube, Webb informed Goodman the author of the videos was
9 Webb's brother, Counter Defendant Sweigert. Webb described Sweigert as being
10 "touched in the head". In Sweigert's own now spoliated broadcasts he has made
11 reference to a family history of schizophrenia.

12 **17.** On June 14, 2017 Webb participated in a broadcast with Goodman during which
13 Webb told Goodman he had information indicating there could be a dirty bomb on
14 board the Maersk Memphis, a cargo ship that was about to dock at the Port of
15 Charleston in South Carolina. Webb stressed the urgency of the matter, informing
16 Goodman that a "dirty bomb" incident at the port could be more destructive than the
17 attacks of September 11, 2001. The incident resulted in calls to the Coast Guard and
18 closure of the Port. After an investigation by authorities including Coast Guard and
19 FBI, the port was reopened and no information about or denial of a dirty bomb has
20 been offered. No charges or accusations have been brought against Goodman by any
21 law enforcement agency.

18. Shortly after the port closure incident, Webb was arrested in Zanesville Ohio, on a charge of Failure to Control charge when he was found by police asleep and intoxicated in his motor vehicle on the side of the road.

19. On or about June 15, 2017 Sweigert published a video to the public on YouTube and other social media platforms making several specific threats against Goodman.

Sweigert has deleted the original post but it has been preserved and republished by Goodman and can be seen at (<https://www.bitchute.com/video/Hz1tRwyu22FW/>) a transcript of the video is included with this pleading (**EXHIBIT A**). In the video Sweigert accuses Goodman of being responsible for Webb's arrest and allegedly abandoning Webb in jail. Sweigert vows revenge, warning Goodman he will be "dead meat" and will "wind up in a body bag". Sweigert goes on threatening to begin legal action intended to put Goodman in jail in retaliation for his alleged transgressions against Sweigert's brother. Sweigert alleges Goodman has broken New York State law. Sweigert calls out to Chavez suggesting they collaborate in attempting to bring a civil suit against Goodman in Arizona. In further threats toward Goodman, Sweigert claims he will "go call all your Hollywood friends and I'll talk to them and say hey we're going to make a lot of money on this, Jason's dead meat". At the time, these threats caused Goodman to fear for his personal safety and even his life. Sweigert continued, boasting of his credentials and experience in litigation as he laid out his plan to sue and otherwise torment Goodman. Sweigert warns Goodman, "Jason you're gonna go find an attorney to read my stuff and we'll play this little game". Three years and many filings later, it is clear that Sweigert's "game" was to

1 abuse the legal process in pursuit of revenge against Goodman, rather than to cure a
2 legitimate injury.

3 20. Concurrent with Sweigert's public threats against Goodman, and contrary to the
4 allegations, Goodman traveled to Ohio on June 15, 2017 at his own expense and paid
5 four thousand dollars (\$4,000) to bail Webb out of jail
6 (<https://youtu.be/FXp9uG2MEYA>). For unknown reasons and contrary to logic, this
7 did not cause Sweigert to forgive Goodman, but instead, drove a three-year long
8 vendetta that continues today and culminates in this legal action.
9

10 21. Beyond the threats in his video, Sweigert has posted a virtually uncountable number
11 of additional videos, at times several per day including posts on Twitter and other
12 social media posts with a wide-ranging array of taunts, threats, false allegations and
13 defamatory claims. Sweigert is in a regular practice of deleting the post once their
14 intended message has been sent. Goodman believes this practice is intended to
15 spoliate evidence that could otherwise be used against Sweigert in litigation.
16
17 Sweigert also maintains a blog at SDNY.INFO. This blog is formatted like a news
18 website and is presented as such, but it is dedicated almost entirely to publishing
19 Swiegert's opinion and editorial about this instant legal matter including statements
20 regarding Judge Caproni's career with the FBI and other inappropriate, conclusory
21 statements. Sweigert is in a regular practice of deleting these postings, sometimes
22 after hours, sometimes after days or longer.
23

24 22. On June 13, 2017 Sweigert's brother, Webb introduced Goodman to Steele. Steele
25 made arrangements to appear on a broadcast with Goodman on June 16, 2017 in New
26 York City. After the port closure incident on June 14, Steele emailed Goodman and
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1 Webb to cancel the in-person interview, falsely stating that Goodman would be
2 arrested by NYPD as a result of staging a “bomb hoax”. This resulted in a
3 disagreement that escalated to Steele suing Goodman in the Eastern District of
4 Virginia. Steele et al v Goodman et al is still pending, and Sweigert has made
5 numerous attempts to intervene. After filing an excessive number of briefs, Sweigert
6 was denied intervention and barred from any further filings in the matter.

7 23. On August 19, this court denied Sweigert’s motion for reconsideration, sending a
8 clear signal that Sweigert’s options to continue abusing the legal process and
9 Goodman were running out. On information and belief, Goodman alleges that
10 immediately following this, Sweigert sought out and contacted a member of the
11 National Academy of Television Arts and Sciences (NATAS) falsely accusing
12 Goodman of violating a NATAS copyright in a video published by Goodman which
13 featured a parody image of an EMMY Award statuette. On August 20, 2020,
14 NATAS President and CEO Adam Sharp (“Sharp”) contacted YouTube via an
15 account linked to his own personal email address and filed a claim which resulted in
16 YouTube’s immediate issuance of a “copyright strike”. A copyright strike is a
17 YouTube specific penalty that cripples Goodman’s ability to conduct normal daily
18 live broadcasts for ninety days and puts Goodman’s YouTube channel in serious
19 jeopardy of permanent and irrevocable deletion by YouTube should additional strikes
20 accumulate during the ninety-day period. The current penalty severely damages
21 Goodman’s ability to reach his audience, grow his subscribership and earn money.
22 Since YouTube is a private company and not a court of law, Goodman is not granted
23 the presumption of innocence or normal due process but rather is penalized on the
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1 mere basis of the allegation. Goodman has challenged the claim on the basis that
2 section 107 of the copyright act specifically protects parody, and fair use decisions
3 often favor news reporting. The news report featuring the parody image reviewed
4 official CDC data and discussed nations that have successfully suppressed or largely
5 overcome Covid-19 infections, purporting to issue imaginary “CRONY” awards to
6 those nations. No actual awards or statues were created or distributed the broadcast
7 was intended to be both ironic, informative and educational. YouTube arbitration of
8 this claim is currently underway, and a determination is expected within two weeks.
9 Goodman’s business is severely hampered by this action in the meantime. Analytical
10 data indicates a marked decrease in subscriber growth as a direct result of the
11 incapacitation. Goodman is confident the alleged violation was brought to NATAS’
12 attention by Sweigert for several reasons. Although it is reasonable to presume
13 NATAS is in a regular practice of defending their copyrights and taking action
14 against violators as alleged by their attorneys in a phone call on August 24, 2020, that
15 does not appear to be what happened in this case. The claimed violation was found in
16 a video published on June 5, 2020 more than two months prior to the complaint.
17 Secondarily, although the complaint was issued against Goodman’s YouTube channel
18 which has over 114,000 regular viewers, however no similar complaint was made
19 against the substantially less viewed channel maintained by Goodman’s co-host John
20 Cullen which contained an exact duplicate of the video, simulcast to that alternate
21 YouTube channel on the same date. Internet search terms that would have led to
22 Goodman’s video would have found both instances of the publication, but in this case
23 did not. Moreover, if NATAS had used advanced image pattern recognition or
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1 artificial intelligence tools to crawl the internet looking for copyright violations, that
2 technique would also have found both instances particularly given that both were
3 located on same network, controlled by YouTube. Lastly, in the course of the
4 ongoing arbitration, YouTube has revealed the alleged violation was “manually
5 identified” confirming Goodman’s beliefs. Lawyers for NATAS have refused to
6 answer Goodman’s direct questions pertaining to the method used to identify the
7 violation, saying only that it was brought to the attention of one of their committee
8 members. Goodman has since manually located other potential violations of NATAS
9 copyright that have not been identified by NATAS including numerous decades old
10 Howard Stern radio broadcasts in which the internationally known personality awards
11 “F-EMMYs” to broadcasters and participants on his radio show. No action has been
12 taken by NATAS to remove these instances from YouTube despite their alleged
13 regular patrolling of the service for such potential violations. The casual observer is
14 far more likely to mistake the “F-EMMY” name and its association with broadcast
15 awards with that of the NATAS protected EMMY name and Statuette. No person
16 other than Sweigert has demonstrated such unrelenting commitment to efforts
17 intended to damage Goodman by any means. Furthermore, Sweigert’s pleadings in
18 this legal matter demonstrate that he carefully reviews all or most of Goodman’s
19 videos and social media post with the express intent of making any allegation he can
20 think of no matter how far removed from facts or law those allegations may be.
21
22 Finally, Sweigert’s June 15, 2017 threat to “call all your Hollywood friends” is highly
23 suggestive that Sweigert actively sought an opportunity to engage in a plan along
24 these lines.

24. In a blog post on his website SDNY.INFO published on or about August 25, 2020 Sweigert uses Goodman's likeness and trademarked brand name without permission, claiming fair use under section 107 of the copyright act. Sweigert's use however is not parody and not actual news reporting. It is not educational in the sense that it relies on completely false and unverified claims and therefore is not protected as fair use. Sweigert deliberately reports false information that is completely unsubstantiated by evidence, rising to the level of actual malice. Sweigert's clear ongoing intention as enunciated in his 2017 threats is to punish and smear Goodman and damage Goodman's business and reputation. Sweigert blog post alleges "Jason Goodman's fake CROWDSOURCE may be illegal under New York law". Goodman's Crowdsource the Truth operation is not fake, it is authentic and relies only on true information to the best of Goodman's knowledge. While Sweigert attempts to protect himself legally by qualifying the statement with the word "may", the content of the article is intended to mislead the reader and presents no true facts or evidence. Sweigert accuses Goodman of using "sock puppets" a type of social media account that presents a false public identity and is intended to convince third parties that the social media account represents someone other than the actual user. This claim is false and Sweigert offers no evidence that Goodman engages in this practice.

25. On August 31, 2020 Sweigert sent email communications to the New York State Attorney General Letitia James (**EXHIBIT B**) including the above-mentioned allegations as well as his First Supplemental Complaint (ECF No. 144)

NATURE OF THE ACTION

26. Since issuing a series of threats against Goodman on June 15, 2017 Sweigert has
engaged in an extraordinary effort to attack Goodman. Sweigert has played a key
role in orchestrating and executing a conspiracy to defame Goodman, extort money
from him via multiple concurrent lawsuits in multiple jurisdictions while
simultaneously engaging in various strategic, extrajudicial actions intended to occupy
Goodman's time, attention and resources and damage Goodman in any way possible.

27. In December 2017, Sweigert entered into a verbal agreement with Simpson and other
third parties during a multiparty telephone call with Simpson, Manuel Chavez III aka
“Defango” (“Chavez”), Nathan Stolpman aka LTV aka Lift the Veil (hereinafter
“Stolpman”), an unknown individual using the false name Hoax Wars (hereinafter
“Hoax Wars”) and possibly other unknown individuals. (ECF No. 105 EXHIBIT E)
This hearsay video recording of the phone call and the included transcript should be
excluded under FRE Rule 804 (b)(3)(A) and (B) as it contains statements against the
declarants' interests and, corroborating circumstances have indicated the
trustworthiness of the information it conveys. During the call, Simpson suggests the
social media network Steemit.com as the “*best way to get JG*” referring to Counter
Plaintiff Goodman. Immediately after this statement, Sweigert speaks about a
“*unified effort*”. Sweigert volunteers to conduct a letter writing and public
defamation and harassment campaign against Goodman. Sweigert insists
“*everybody's got to find their part in this and do their part that's it.*” In reference to
Counter Plaintiff with regard to his harassing letter writing campaign, Sweigert
openly admits “*I'm writing that shit all the time behind the scenes on Jason*” to

which Simpson responds “*I can get you paid for it in a way that's not connected to the government at all*”. Sweigert agrees, responding to Simpson’s offer “*Alright, ok we can do that.*” Sweigert goes on to clearly state “*I volunteer to be the liaison to fuck with these guys through government processes through military processes through law enforcement processes.*” This is an open admission of his eagerness to violate 40 N.Y. Con. Laws Ann. § 240.30 Aggravated harassment in the second degree, and his commitment to doing so is shown by his overt actions over the months that followed.

- 28. During the multiparty call, Sweigert makes numerous direct references to the conspiracy stating among other things, “*everybody's got to find their part in this and do their part*” imploring his co-conspirators to act against Goodman.
- 29. During the December 2017 multiparty call, Sweigert specifically referenced utilizing the civil justice system as a weapon against Goodman, an effort he has followed through with in furtherance of the conspiracy.
- 30. In a voice mail message left by Simpson for Counter Plaintiff Goodman, Simpson threatens “*guys like Defango [reference to Chavez] and myself and about 50 other people that really know how to do this shit are gonna make it a lot more difficult for you to do really about anything just because we're gonna make you famous for the stupid cocksucking idiot that you are so I hope that you play this for your friends and we can either talk or you can just go ahead and see what we're gonna do so good luck to ya butthead.*” This voice mail message is a direct violation of 40 N.Y. Con. Laws Ann. § 240.30 Aggravated harassment in the second degree.

31. Simpson's choice to deliberately record this threatening voice mail message represents an overt act in furtherance of the conspiracy to interfere with Goodman's business and an admission to the planned defamation and harassment to be executed by Simpson and as many as 50 (fifty) co-conspirators according to the threat. This hearsay admission should be excluded under FRE Rule 804 (b)(3)(A) and (B) because it contains statements against the declarants' interests and, corroborating circumstances have indicated the trustworthiness of the information it conveys.

32. Through his interactions and communications with surrogates, co-conspirators and / or intermediaries including his own brother Webb, Chavez and Simpson, Sweigert has aligned his efforts with those of the Plaintiff in Steele v Goodman a federal lawsuit currently active in the Eastern District of Virginia (3:17-cv-00601-MHL). Webb, Chavez and Simpson have each communicated directly with Steele on multiple occasions. Sweigert attempted to intervene in Steele v. Goodman but was denied by the honorable M. Hannah Lauck. (ECF No. 105 EXHIBIT C)

33. On April 22, 2020 Sweigert emailed the chief legal counsel of Patreon.com Colin Sullivan via the email address legal@patreon.com alerting Sullivan to a judge's order issued in Steele v Goodman having no connection whatsoever to Sullivan or Patreon.

(EXHIBIT C) Patreon is a critical service provider for Goodman's. Sweigert has repeatedly attempted to disrupt the relationship between Patreon and Goodman with baseless legal threats directed at Patreon and harassing emails as with the communication of April 22, 2020. On information and belief Goodman alleges Sweigert did this with malicious intent in an effort to frustrate the business relationship between Goodman and Patreon. This belief is furthered by the fact that

1 after initially agreeing, Patreon CEO Jack Conte later declined an invitation to be
2 interviewed by Goodman, specifically citing the ongoing legal action with Sweigert
3 as the reason.
4

5 34. On information and belief, Goodman alleges that Sweigert uses social media and blog
6 posts as a form of “call and response” type communication. Once his message is
7 received by the parties it is intended for, the message is removed, the evidence
8 spoliated and Sweigert proceeds to challenge the authenticity of any presentation of
9 the material.
10

11 35. Sweigert claims to be a former U.S. Air Force radio specialist with particular
12 expertise in communications and information technology. Irrespective of the truth or
13 falsehood of this claim, Sweigert utilizes military, intelligence and other sophisticated
14 deceptive tactics to communicate with an active and dynamic network of co-
15 conspirators who have themselves engaged in overt acts in furtherance of the
16 conspiracy. This is done while deliberately creating the illusion that these co-
17 conspirators are independent operators. Through the use of clandestine
18 communications and compartmentalization of actions some co-conspirators may not
19 be aware of the full scope of the conspiracy, but rather as Sweigert stated during the
20 multiparty call of December 2017 “*everybody's got to find their part in this and do*
21 *their part that's it.*” It is highly likely that many of the co-conspirators are unaware
22 of the scope of the operation or the full extent to which other parties are involved.
23

24 36. Sweigert attempted to intervene in Steele v Goodman but was denied. In support of
25 his attempt, several non-parties to the suit submitted declarations in support of
26 intervention. One of those non-parties was a citizen of New Zealand Outtrim
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1 37. Outtrim falsely claims to be a citizen of California, but this is untrue. His address of
2 record is a PO Box at a commercial mailing business and his filing with the clerk of
3 the court is clearly seen to be sent via airmail from his residence in New Zealand.
4 (ECF No. 109 page 4)

5 38. Outtrim has attempted to intervene in this instant legal matter (ECF No. 107).
6 Outtrim initially attempted to inappropriately communicate directly with chambers
7 via an email address provided to the litigants by Magistrate Judge Stewart Aaron. On
8 information and belief Goodman alleges that Sweigert provided this email address to
9 Outtrim in furtherance of the conspiracy.

10 39. Outtrim has published multiple false stories defaming Goodman on his own blog
11 including allegations of Goodman causing political unrest in Ukraine.

12 [https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-](https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before/)
13 before/

14 The allegations are false, have no basis in fact or evidence and no purpose
15 other than harassment and defamation of Goodman. Publishing the article was an
16 overt act in furtherance of the conspiracy on Outtrim's part.

17 40. On November 29, 2019 Sweigert re-published Outtrim's article on his own sdny.news
18 blog [https://sdny.news/2019/11/29/insane-in-the-ukraine-j-go-like-youve-never-seen-](https://sdny.news/2019/11/29/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before-updates-burners-me-me-burners-and-thc-man/)
19 him-before-updates-burners-me-me-burners-and-thc-man/

20 Republishing the Outtrim
21 false story was another overt act on Sweigert's part in furtherance of the conspiracy.

22 41. The Outtrim article makes the categorically false statement "*Jason Goodman is the*
23 *CEO of a company which is operating the world's most advanced commercial HD*
24 *video drone in Ukraine at the exact time a Western-backed coup breaks out there.*"

25 Both Outtrim and Sweigert use this claim in attempts to accuse Goodman of heinous

1 crimes including terrorism, subversion of foreign governments and involvement in a
2 recent explosion at a liquid natural gas facility in Texas. Aside from public news
3 reports Goodman has no knowledge of or involvement in the Texas LNG incident.
4

5 42. On November 29, 2018 Outtrim published a video interview with Holmes. In the
6 interview, Holmes alleged Negron had told her Goodman sent text messages
7 containing naked pictures of himself to "young girls" while on a business trip with
8 Negron in London. This false statement is totally baseless and unsupported by
9 evidence. The statement has been denied by Negron via her counsel stating in an
10 email dated May 7, 2019 "Please respond that I did not tell Lutzke that Jason hit on
11 underage girls. She leveled that accusation on her own, and tried to draw me in on it,
12 but I did not have any knowledge of such activity and thus never made any such
13 accusations." (**EXHIBIT D**) Despite this fact, the false claim is used by Sweigert in
14 this instant legal action in an effort to obtain access to an alleged Tinder account held
15 by Goodman. Tinder is an online dating application. Goodman's romantic life has no
16 bearing on this legal matter and any contents of any alleged Tinder account would
17 serve no practical purpose other than revealing information intended to embarrass
18 Goodman or people associated with Goodman unrelated to this action.
19

20 43. In a phone call between Goodman and Holmes on or about April 30, 2019 Holmes
21 admits to working with Sweigert in his efforts to intervene in Steele et al v Goodman
22 et al (<https://www.youtube.com/watch?v=WwyRPFhW-IIE>). Although Holmes is a
23 known liar who has since been arrested for perjury and attempting to influence a
24 public official, the claim is consistent with other facts and circumstances and
25 Goodman believes it to be true.
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1 44. During the November – December 2018 timeframe Sweigert utilized PO Box 152
2 Mesa AZ 85211 as his official address in this instant legal matter. Sweigert was not a
3 resident of AZ and not officially associated with the USPS mailbox according to the
4 USPS. In an effort to obscure his true location or otherwise frustrate Goodman's
5 ability to communicate legal matters and or waste money on printing and postage,
6 Sweigert fraudulently claimed this address. Multiple filings mailed to Sweigert at
7 that address were returned as undeliverable. Investigation by Goodman, including
8 travel to the post office in Mesa Arizona determined that Sweigert coerced Marion
9 Rapp, the official owner of the box, to add Sweigert on December 1, 2018 in a further
10 act of deception, to cause it to appear Sweigert was properly associated with the PO
11 Box at the time of the filings. On information and belief, Goodman alleges Sweigert
12 conspired with Rapp to deliberately commit fraud on this court and to utilize the
13 United States Postal Service in furtherance of that fraud. In a phone call to the US
14 Postal Police, an inspector informed Goodman that a finding of fraud on the court
15 would invoke a Postal Police investigation if the US Postal service were utilized in
16 furtherance of the fraud.

20 45. On August 31, 2020 Sweigert sent an email to New York State attorney general
21 falsely claiming Goodman had violated New York Copyright laws. (**EXHIBIT E**)

23 **JURISDICTION AND VENUE**

24 46. This is an action for damages in an amount in excess of the minimum jurisdictional
25 limits of this Court.

26 47. This Court has jurisdiction over this dispute pursuant to 28 U.S.C. §1332 (diversity
27 jurisdiction) in that Sweigert and Goodman are citizens of different states and the

1 amount in controversy exceeds seventy-five thousand (\$75,000), exclusive of interest
2 and costs.

3 48. This Court has personal jurisdiction over Counter Plaintiff. Counter Plaintiff resides
5 in New York City; Counter Defendant alleges to conduct regular business in New
6 York City; and this action is being brought in response to Case 1:18-cv-08653-VEC-
7 SDA Document 1 Filed 06/14/18 within the Southern District of New York.

8 49. Venue is proper in this Court as (a) the cause of action arose within the jurisdiction of
9 this Court and (b) Counter Plaintiff resides within this District.

10 **FACTUAL ALLEGATIONS**

11 50. Since June 15, 2017 Sweigert has endeavored to torment Goodman and destroy his
12 reputation and business via a conspiracy to defame and simultaneous conspiracy to
13 sue Goodman for improper purposes in multiple jurisdictions concurrently.

14 51. Sweigert has published known false statements with actual malice and the express
15 intent to defame Goodman, damage his business and embroil Goodman in civil or
16 criminal litigation.

17 52. Swiegert has violated Goodman's privacy and trademark in furtherance of the
18 conspiracy and publication of false claims and statements.

19 53. Sweigert has utilized the United States Postal Service in furtherance of the
20 conspiracy.

21 **COUNT 1 DEFAMTION**

22 54. Counter Plaintiff Goodman re-alleges paragraphs 1 - 74 as if the same were fully set
23 forth herein. Sweigert made his false and defamatory statements deliberately and
24 maliciously with the intent to intimidate, discredit and defame Goodman.

1 55. Sweigert and co-conspirators engaged in Defamation Per Se on several occasions by
2 deliberately making false statements which were published to third parties without
3 privilege of authorization; with fault amounting to AT LEAST negligence; that
4 caused special harm.
5

6 56. Because Sweigert's false allegations of international terrorism or foreknowledge of
7 terrorist events are such heinous false statements likely to cause public hate toward
8 Goodman implying involvement in criminal activity, damages to worldwide
9 reputation are inherent.
10

COUNT 2 CIVIL CONSPIRACY

11 57. It is textbook law that New York does not recognize an independent tort of
12 conspiracy. If an underlying, actionable tort is established, however, [the] Plaintiff
13 may plead the existence of a conspiracy in order to demonstrate that each defendant's
14 conduct was part of a common scheme." Sepenuk v. Case 1:15-cv-04244-JGK
15 Document 214 Filed 09/12/16 Page 72 of 88 73 Marshall, No. 98-cv-1569 (RCC),
16 2000 WL 1808977, at (S.D.N.Y.Dec. 8, 2000) (citation omitted). To establish a
17 claim of civil conspiracy, the plaintiffs "must demonstrate the primary tort, plus the
18 following four elements: (1) an agreement between two or more parties; (2) an overt
19 act in furtherance of the agreement; (3) the parties' intentional participation in the
20 furtherance of a plan or purpose; and (4) resulting damage or injury." World
21 Wrestling Fed'n Entm't, Inc. v. Bozell, 142 F. Supp. 2d 514, 532 (S.D.N.Y. 2001).
22
23 Under New York law, in order to be liable for acting in concert with a primary
24 tortfeasor under a theory of either conspiracy or aiding and abetting, the defendant
25 must know of the wrongful nature of the primary actor's conduct. Pittman by Pittman
26
27
28

v. Grayson, 149 F.3d 111, 123 (2d Cir. 1998). "It is essential that each defendant charged with acting in concert have acted tortiously and that one of the defendants committed an act in pursuance of the agreement which constitutes a tort." Rastelli v. Goodyear Tire & Rubber Co., 591 N.E.2d 222, 224 (N.Y. 1992).

COUNT 3 New York Civil Rights Law § 50 and 51

58. On or around August 25, 2020 Sweigert published to the general public a blog post claiming to be news which contained unverified false accusations that have no basis in fact and are unsupported by evidence. In furtherance of these false claims, Sweigert violated Goodman's right to publicity by utilizing multiple photographs of Goodman without Goodman's permission. Sweigert also utilized images taken from video recordings which are the exclusive intellectual property of Goodman. Sweigert's reckless disregard for the truth of these matters amount to actual malice in their publication. Courts have held that defendants may forfeit the newsworthiness defense if the article in question contains a "severe" degree of falsity. Lerman v. Flynt Distributing, 745 F.2d 123, 132-33 (2d Cir. 1984) Even if the counter plaintiff is considered a public figure, the defendant cannot claim fair use of Goodman's likeness and intellectual property if he published the falsehoods with actual malice. Id. at 135

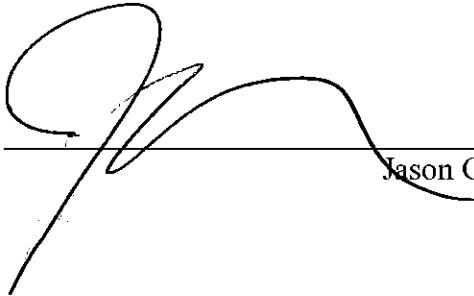
PRAYER FOR RELIEF

59. WHEREFORE, Counter Plaintiff Goodman respectfully requests judgment against Counter Defendant Sweigert, awarding injunctive relief, declaring Sweigert a vexatious litigant and specifically enjoining Sweigert from bringing further pro se litigation against Goodman in this or any matter in any US District Court as well as compensatory, consequential, exemplary, and punitive damages in an amount to be

1 determined at trial, but in excess of the \$75,000 jurisdictional requirement; expenses
2 and fees related to this suit and such other and further relief as the Court may deem
3 just and proper.
4
5
6

7 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.
8 Further, I hereby attest that the attached exhibits are accurate and true copies of source
9 documents as described.

10 Signed this 31th day of August 2020
11

12
13
14
15 
16 Jason Goodman, Defendant, Pro Se
17 252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org
18
19
20
21
22
23
24
25
26
27
28

(EXHIBIT A)

SWEIGERT JUNE 15, 2017 VIDEO TRANSCRIPT

0:00:00.320,0:00:05.280
everybody uh this is dave checking in um

0:00:06.080,0:00:11.280
now that my resume is public knowledge

0:00:08.960,0:00:12.559
yeah i have a bad acting reel so what

0:00:11.280,0:00:14.240
you know when you're in la

0:00:12.559,0:00:15.679
everybody says they're an actor it's

0:00:14.240,0:00:17.279
like when you go to memphis everybody

0:00:15.679,0:00:19.359
says they're a songwriter

0:00:17.279,0:00:20.560
give me a break taxi cab drivers say

0:00:19.359,0:00:23.600
they're actors

0:00:20.560,0:00:27.599
oh he's part of a c.i.a actor elite

0:00:23.600,0:00:27.599
that's run by scientology to keep

0:00:29.760,0:00:36.079
however what my resume

0:00:33.040,0:00:37.600
demonstrates to most of you is that i

0:00:36.079,0:00:39.120
really know my stuff when it comes to

0:00:37.600,0:00:41.600
electronic evidence

0:00:39.120,0:00:44.160
and federal law and the violations of

0:00:41.600,0:00:46.239
federal law

0:00:44.160,0:00:48.160

so let's talk about jason goodman and
0:00:46.239,0:00:50.000
trish whatever her name is patricia
0:00:48.160,0:00:51.039
rogaine i don't know what her name is
0:00:50.000,0:00:52.320
but i'm going to tell you something
0:00:51.039,0:00:54.079
right now i'm going to launch a
0:00:52.320,0:00:56.079
crowdsourcing investigation
0:00:54.079,0:00:58.719
to put you two assholes in jail for what
0:00:56.079,0:01:00.640
you did to my brother all right jason so
0:00:58.719,0:01:03.440
you want a reality show
0:01:00.640,0:01:06.159
larping around live action reality
0:01:03.440,0:01:08.080
you're gonna get it right now
0:01:06.159,0:01:10.000
because i think i can prove to a
0:01:08.080,0:01:11.600
prosecutor that you broke the law i know
0:01:10.000,0:01:12.960
i can prove to a prosecutor that you
0:01:11.600,0:01:15.759
broke new york state law
0:01:12.960,0:01:17.520
with your stupid privacy stunt that
0:01:15.759,0:01:20.560
started this entire nightmare
0:01:17.520,0:01:22.720
called the seth rich files who spoofed
0:01:20.560,0:01:24.240

the seth rich files remember that jason
0:01:22.720,0:01:26.479
remember when you were screaming
0:01:24.240,0:01:29.200
hysterically at the camera
0:01:26.479,0:01:30.680
which by the way go watch the mr cat eye
0:01:29.200,0:01:34.000
video
0:01:30.680,0:01:36.960
m-r-c-a-t-i it's an hour long
0:01:34.000,0:01:39.200
he explains the whole process and how
0:01:36.960,0:01:40.960
you fit into it jason and how you fit
0:01:39.200,0:01:43.520
into a trish
0:01:40.960,0:01:45.040
so you want to start exposing people
0:01:43.520,0:01:48.399
guess who we're going to expose
0:01:45.040,0:01:50.399
jason and trish now i have a couple of
0:01:48.399,0:01:52.240
allies besides the legal community
0:01:50.399,0:01:54.159
because as you know jason i'm an expert
0:01:52.240,0:01:57.280
when it comes to expert testimony
0:01:54.159,0:01:58.560
about data privacy and internet security
0:01:57.280,0:02:00.479
and i'm one of the most highly
0:01:58.560,0:02:02.240
credentialed people in the united states
0:02:00.479,0:02:04.799

and yes i did work for the national

0:02:02.240,0:02:06.479
security agency as a technical expert

0:02:04.799,0:02:08.080
and yes i did work for special

0:02:06.479,0:02:10.640
operations as a technical

0:02:08.080,0:02:12.400
expert and yes i work many many many

0:02:10.640,0:02:14.959
jobs as a technical expert

0:02:12.400,0:02:16.239
at the legal points and the technology

0:02:14.959,0:02:18.239
points

0:02:16.239,0:02:20.160
very few people can bridge these things

0:02:18.239,0:02:22.800
and i've had many attorneys

0:02:20.160,0:02:25.040
tell me remarkable work tremendous work

0:02:22.800,0:02:26.959
i've never seen anything like this

0:02:25.040,0:02:29.440
and now jason you're gonna go find an

0:02:26.959,0:02:31.519
attorney to read my stuff

0:02:29.440,0:02:33.920
and we'll play this little game because

0:02:31.519,0:02:36.319
my brother sits in a jail

0:02:33.920,0:02:37.519
and you have given him a complete mind

0:02:36.319,0:02:39.519
fuck

0:02:37.519,0:02:41.200

and now when he probably believed in you
0:02:39.519,0:02:43.920
and you told the world he was your best
0:02:41.200,0:02:45.200
friend in life you just abandoned him
0:02:43.920,0:02:46.640
well you're not going to do that to my
0:02:45.200,0:02:49.200
brother
0:02:46.640,0:02:51.360
and your little troll squad has already
0:02:49.200,0:02:52.160
destroyed my career so let's just use my
0:02:51.360,0:02:54.800
career for new
0:02:52.160,0:02:56.560
summer project let's crowd source all
0:02:54.800,0:03:00.879
the information we need to put
0:02:56.560,0:03:02.239
trish and jason in jail let's do that
0:03:00.879,0:03:04.239
and you know what i bet you i can get
0:03:02.239,0:03:05.840
the maritime people behind me i bet i
0:03:04.239,0:03:07.680
can get the coast guard behind me i bet
0:03:05.840,0:03:08.080
you i can get the seafarers union behind
0:03:07.680,0:03:10.159
me
0:03:08.080,0:03:12.000
the mayor of charleston the governor of
0:03:10.159,0:03:14.239
charleston everybody's going to be
0:03:12.000,0:03:16.400

behind me you stupid asshole for what
0:03:14.239,0:03:18.080
you did to my brother
0:03:16.400,0:03:19.519
you could have intervened you've could
0:03:18.080,0:03:21.599
have helped them and you just let them
0:03:19.519,0:03:23.360
go off the deep end
0:03:21.599,0:03:24.879
and we had guys like you in the military
0:03:23.360,0:03:27.360
you know what jason they all wound up in
0:03:24.879,0:03:29.280
body bags and became oil stains
0:03:27.360,0:03:30.799
so we know all about your kind and you
0:03:29.280,0:03:33.040
know here's the problem jason
0:03:30.799,0:03:34.640
go call all your hollywood friends and
0:03:33.040,0:03:36.799
i'll talk to them and say hey we're
0:03:34.640,0:03:39.280
going to make a lot of money on this
0:03:36.799,0:03:41.920
jason's dead meat don't you want to get
0:03:39.280,0:03:43.280
into our patreon account
0:03:41.920,0:03:44.720
well there's a lot of people out there
0:03:43.280,0:03:47.519
that want to start doing radio
0:03:44.720,0:03:49.120
interviews with me hey defango wink wink
0:03:47.519,0:03:50.560

don't miss your big opportunity for

0:03:49.120,0:03:53.920
about 2 000 people

0:03:50.560,0:03:56.239
on a live stream so max egan

0:03:53.920,0:03:56.959
who got screwed over by george webb

0:03:56.239,0:03:59.680
because max

0:03:56.959,0:04:00.239
egan interviewed my brother and linda

0:03:59.680,0:04:02.879
west

0:04:00.239,0:04:04.319
and possibly truther girls and possibly

0:04:02.879,0:04:06.239
richie from boston

0:04:04.319,0:04:08.319
we all are thinking about doing a show

0:04:06.239,0:04:11.360
and that includes agent 19

0:04:08.319,0:04:13.200
and that includes montegraph

0:04:11.360,0:04:14.480
because monograph i know your agenda and

0:04:13.200,0:04:15.200
i know what you want to accomplish it

0:04:14.480,0:04:18.639
but the way

0:04:15.200,0:04:21.040
through that agenda is jason goodman

0:04:18.639,0:04:21.759
and trish whatever the hell her name is

0:04:21.040,0:04:23.360
rogaine

0:04:21.759,0:04:24.880

and you know what jason i'm going to

0:04:23.360,0:04:27.360
make i'm going to make a

0:04:24.880,0:04:28.240
convincing argument to a prosecutor in

0:04:27.360,0:04:30.400
new york

0:04:28.240,0:04:32.320
that that video you did about the fango

0:04:30.400,0:04:34.080
is inciting violence

0:04:32.320,0:04:36.479
and we're going to see what a jury in

0:04:34.080,0:04:38.639
new york has to say about your opinions

0:04:36.479,0:04:39.520
or maybe we'll go to arizona what do you

0:04:38.639,0:04:40.320
think about that

0:04:39.520,0:04:42.800
but i'm going to tell you something

0:04:40.320,0:04:44.960
right now i believe based on my

0:04:42.800,0:04:46.720
technical background and my experience

0:04:44.960,0:04:49.040
and my knowledge of federal laws

0:04:46.720,0:04:51.360
i'm going to make an educated guess that

0:04:49.040,0:04:52.560
this little file transfer game that you

0:04:51.360,0:04:54.400
played around with

0:04:52.560,0:04:56.080
i think you broke federal law and i

0:04:54.400,0:04:58.240

think you broke state law and i don't
0:04:56.080,0:05:00.240
think you want anybody to talk about it
0:04:58.240,0:05:01.840
so why don't we put the focus back on
0:05:00.240,0:05:04.800
jason and trish
0:05:01.840,0:05:06.320
and their use of electronic files and
0:05:04.800,0:05:08.800
transporting electronic
0:05:06.320,0:05:10.479
files across state lines for the sole
0:05:08.800,0:05:13.280
intent of distributing them to
0:05:10.479,0:05:14.560
unknowing and unwitting participants and
0:05:13.280,0:05:16.800
there's conspiracy
0:05:14.560,0:05:18.880
and trish was on her live stream today
0:05:16.800,0:05:20.560
talking about rico
0:05:18.880,0:05:22.880
hey listen trish do you want to play
0:05:20.560,0:05:23.759
rico we can put a rico case together for
0:05:22.880,0:05:26.560
this
0:05:23.759,0:05:27.120
not a problem not a problem and you know
0:05:26.560,0:05:28.880
what
0:05:27.120,0:05:31.039
linda west and i already went through
0:05:28.880,0:05:32.479

that we had to put a rico case together

0:05:31.039,0:05:34.160
against dallas goldbug

0:05:32.479,0:05:35.919
that's why he's disappeared into the

0:05:34.160,0:05:37.440
night so you know what we'll just dust

0:05:35.919,0:05:39.440
that off and put your names on it and

0:05:37.440,0:05:41.120
see how it works on you

0:05:39.440,0:05:43.039
okay because you're not going to come

0:05:41.120,0:05:44.720
around and try to push your way into

0:05:43.039,0:05:45.280
this community that's been built up over

0:05:44.720,0:05:47.919
the last

0:05:45.280,0:05:49.680
decade and take a big massive defecation

0:05:47.919,0:05:52.160
on my brother's reputation

0:05:49.680,0:05:54.240
and my reputation by the way and walk

0:05:52.160,0:05:56.639
away after you shut down

0:05:54.240,0:05:58.639
indirectly or directly participating or

0:05:56.639,0:06:00.479
unparticipating in some manner

0:05:58.639,0:06:01.919
you shut down one of the busiest ports

0:06:00.479,0:06:04.880
in the united states

0:06:01.919,0:06:06.319

in a terroristic activity and i also

0:06:04.880,0:06:08.400
think homeland security is going to be

0:06:06.319,0:06:10.400
very interested in understanding more

0:06:08.400,0:06:15.120
about these tactics

0:06:10.400,0:06:15.120
so have fun jason and trish

(EXHIBIT B)



SDNY.ORG

Jason Goodman George Webb Cyber
Stalking Alt-Right DEFANGO Robert
David Steele Larry Klayman

Home New Page Blog

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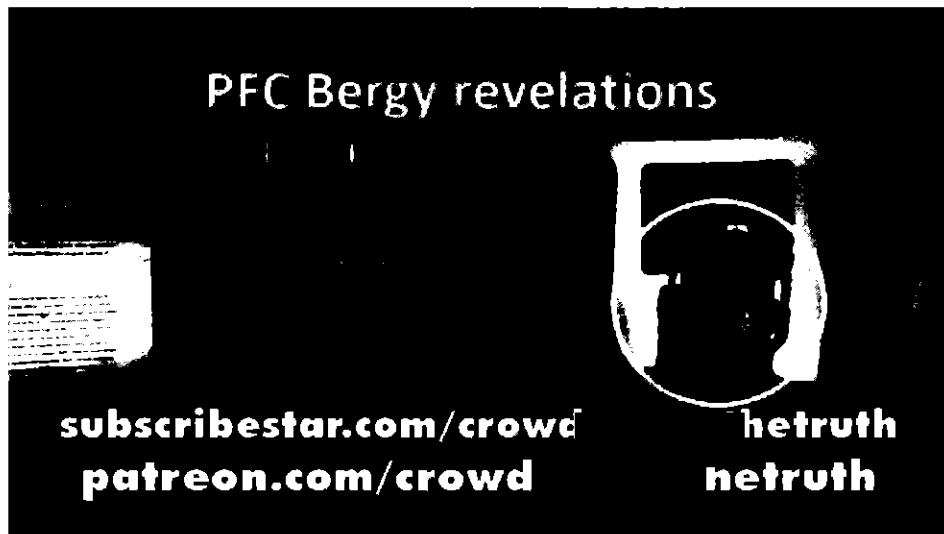
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#SDNYORG 5 days ago 3 min read



Jason Goodman's fake CROWDSOURCE may be illegal under New York law, court documents allege

Updated: a day ago



Patrick Bergy Exposes the Atlantic Council & Obama's Jim Jones In Russiagate & Ukrainegate

9,250 views • Streamed live on Oct 16, 2019

609 14 SHARE SAVE

OPINION AND EDITORIAL

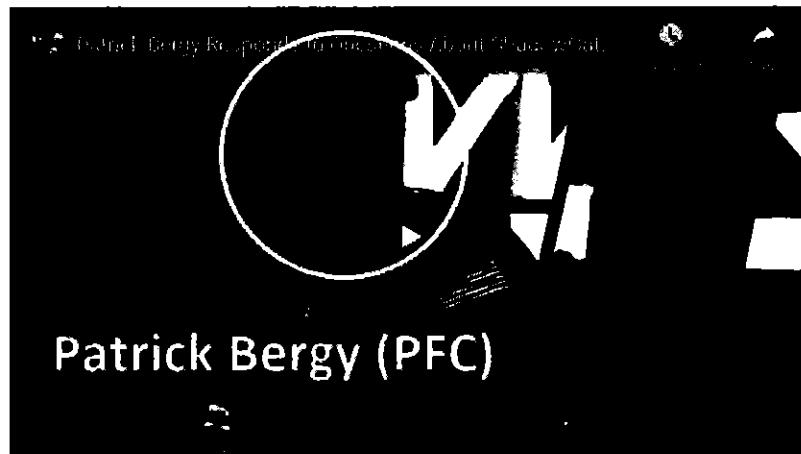
Let's Chat!

We'll reply as soon as we can

In a startling revelation, court documents filed in the New York City Jason Goodman slander, defamation and libel lawsuit indicate that Jason Goodman's CROWDSOURCE THE TRUTH conspiracy social media brand may be illegal under New York's consumer and unfair practices law (see New York General Business Law sections 349 and 350).

Ironically, it appears that the disclosures concerning Inform and Influence Activities (IIA) in Millie Weaver's "ShadowGate" documentary film -- starring PFC Patrick Bergy -- may have led to this recent allegation.

The core of IIA, according to PFC Bergy (a frequent Jason Goodman podcast side-kick) is the manipulation of public opinion via the use of deception with "sock puppet" social media accounts and the use of "bots" to create false public consensus and popularity. For example, one person controlling 15-25 fake personas.



Above: PFC Patrick Bergy appears with Jason Goodman on the conspiracy show CROWDSOURCE THE TRUTH



Above: "Conspiracy theorist" Jason Goodman who "concocted outlandish conspiracy theories", Hon. Valerie Caproni, New York federal judge.

Recently the New York state Attorney General has declared social media influencers (like Goodman) that rely on "sock puppets" and "bots" are operating against New York's General Business Law (GBL).

Letitia James

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Attorney General James Announces Groundbreaking Settlement With Sellers Of Fake Followers And "Likes" On Social Media

*Settlement is First in the Country to Find that Selling Fake Followers and "Likes"
Is Illegal Deception and that Fake Activity Using Stolen Identities Is Illegal
Impersonation*

"NEW YORK – Attorney General Letitia James today announced a precedent-setting settlement over the sale of fake followers, "likes," and views on social media platforms, including Twitter and YouTube, using fake activity from false accounts. The settlement prohibits Devumi LLC and related companies ("Devu

Let's Chat!
We'll reply as soon as we can

any of the same misconduct going forward. This settlement marks the first finding by a law enforcement agency that selling fake social media engagement and using stolen identities to engage in online activity is illegal.

"Bots and other fake accounts have been running rampant on social media platforms, often stealing real people's identities to carry out fraud," said Attorney General Letitia James. "As people and companies like Devumi continue to make a quick buck by lying to honest Americans, my office will continue to find and stop anyone who sells online deception. With this settlement, we are sending a clear message that anyone profiting off of deception and impersonation is breaking the law and will be held accountable."

<https://ag.ny.gov/press-release/2019/attorney-general-james-announces-groundbreaking-settlement-sellers-fake-followers>



Great American Fake-Off? FTC cases challenge bogus Influencer metrics and fake reviews

By: Lesley Fair | Oct 21, 2019 2:06PM

There isn't a competition to find ways to use social media to mislead consumers. (At least we hope there isn't.) But with apologies to fans of a certain British baking program, separate FTC actions just might qualify two companies as "Star Fakers" for fabricating followers and skewing reviews. The cases demonstrate why cooking up deceptive tactics could land your business on an episode of The Great American Fake-Off.

"For individuals and businesses looking for the recipe for social media influence, there are a few ingredients to avoid: fake followers, phony subscribers, and bogus likes. But according to the FTC, that's what Devumi and CEO German Calas, Jr., sold to people trying to artificially inflate their presence on social media.

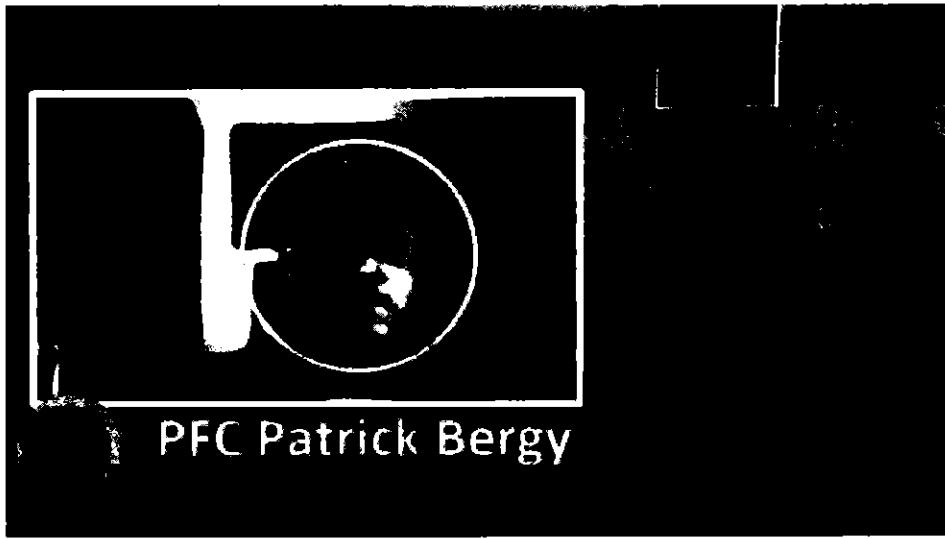
The FTC alleges that by selling fake indicators of social media influence, the defendants provided customers with the means and instrumentalities to commit deceptive acts or practices – which itself violates the FTC Act."

<https://www.ftc.gov/news-events/blogs/business-blog/2019/10/great-american-fake-ftc-cases-challenge-bogus-influencer>

Let's Chat!

We'll reply as soon as we can.

13. Defendants sold fake subscribers to the operators of YouTube channels and fake views to the posters of individual YouTube videos, including musicians who wanted to inflate the popularity of their songs. Defendants had over 4,000 sales of fake YouTube subscribers and over 32,000 sales of fake YouTube views. Defendants enabled purchasers of fake YouTube subscribers and views to deceive potential viewers and potential music purchasers.



ShadowNet Hacker Patrick Bergy Smashes HAMR Speculation
4,480 views · Streamed live on Oct 30, 2019

like 231 | 11 | SHARE | SAVE | ...

Above: PFC Patrick Bergy listens to CROWDSOURCE THE TRUTH interviewer

Let's Chat!

We'll reply as soon as we can



Persona Management Software.

Solicitation Number: RTB220610
Agency: Department of the Air Force
Office: Air Mobility Command
Location: 6th Contracting Squadron

Solicitation Number: **RTB220610** Notice Type:
Sources Sought

Synopsis:

Added Jun 22, 2010 1:42 pm Modified: Jun 22, 2010 2:07 pm Track

Changes

0001- Online Persona Management Service. 50 User Licenses, 10 Personas per user.

Software will allow 10 personas per user, replete with background , history, supporting details, and cyber presences that are technically, culturally and geographically consistent. Individual applications will enable an operator to exercise a number of different online persons from the same workstation and without fear of being discovered by sophisticated adversaries. Personas must be able to appear to originate in nearly any part of the world and can interact through conventional online services and social media platforms. The service includes a user friendly application environment to maximize the user's situational awareness by displaying real-time local information.

Above: Military solicitation announcement for fake "sock puppet" software, circa 2010

JASON GOODMAN'S BOT MASTER QUINN MICHAELS

The latest "Supplemental Complaint" cites allegations made two years ago in the slander, defamation and libel lawsuit that orbit Quinn Michaels, aka Korey Atkin (a former Jason Goodman side-kick, visited at hospital bed side by Goodman). Two years ago Michaels (Atkin) apparently made a series of videos describing the "sock puppet" and "bot" nature of social media influence operations (IIA).

Michaels's comments led to widespread suspicions that CROWDSOURCE THE TRUTH was using fake "likes", fake "subscribers" and fake "comments" to create the false impression that Jason Goodman's conspiracy brand was more popular than it really was (or currently is). If so, this is now considered illegal in New York State.

Let's Chat!

We'll reply as soon as we can



Hack to the Future – Exploring the Swelgert, Hearst, Buffett Time Phones with Quinn Michaels

1,486 views · May 6, 2018

40 14 SHARE SAVE

The image shows a screenshot of an Amazon product page. At the top, the Amazon logo is visible along with a "Handmade" filter button. The main product image is a black coffee mug with a handle on the right. To the left of the main image are three smaller thumbnail images of the same mug from different angles. To the right of the main image, the product title is displayed in a vertical stack: "Quinn Michaels", "Crowdsource The Truth", "Timephone Jason", "Goodman - Coffee Mugs", and "Best Gift For Father Day". The background of the page is white, and the overall layout is clean and typical of an e-commerce website.

Let's Chat!

We'll reply as soon as we can

QUINN MICHAELS: "MORE FOR JASON GOODMAN OF CROWDSOURCE THE TRUTH"

WATCH



Above: Quinn Michaels reveals secrets about Jason Goodman

COURT DOCUMENTS

The latest court documents can be viewed here:

<https://trackingmeroz.wordpress.com/2020/08/25/d-george-sweigert-vs-jason-goodman-document-144-144-1-plaintiffs-verified-supplemental-complaint-with-request-for-injunctive-relief/>

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See All

Let's Chat!

We'll reply as soon as we can

[Is "ShadowNet" a cover-up for Akron plane crash of presidentia...](#)

300

2

5

[Patrick Bergy becomes "ShadowNet" sock puppet accou...](#)

513

Write a comment

7

[SDNY FBI judge gives Jason Goodman third bite at the apple ...](#)

137

Write a comment

4

Log in to leave a comment.

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Let's Chat!

We'll reply as soon as we can

(EXHIBIT C)

From: David George Acton Sweigert spoliation-notice@mailbox.org 
Subject: Re: Copyright strike
Date: August 31, 2020 at 1:22 PM
To: Jason Goodman truth@crowdsourcethetruth.org, Spoliation Notice spoliation-notice@mailbox.org
Cc: jasongoodman72@protonmail.com, nysag@ag.ny.gov, NYAG.Pressoffice@ag.ny.gov



OK,

In that case I will send the proposed supplemental complaint (see SDNY) to the N.Y.A.G., the U.S. Federal Trade Commission and the Emmy Academy as a courtesy to you.

Best,

D.G.

On 08/31/2020 7:16 PM Jason Goodman <truth@crowdsourcethetruth.org> wrote:

I'm not going to answer your interrogatories in this forum. If you would like to have a phone conversation to address your concerns, I would be amenable to that.

On Aug 31, 2020, at 1:09 PM, David George Acton Sweigert <spoliation-notice@mailbox.org> wrote:

Mr. Goodman:

Question no. 1:

When were accusations made public, that you were responsible for the arrest of George Webb?

Question no. 2:

Are you aware that litigation was filed against you on June 14, 2018, about 2.5 years ago? Is this the obsessive "public menace" issue you refer to?

Question no. 3:

Do you have any documentation filed with the U.S. Postal Inspector regarding "mail fraud"? Did you file a complaint? Do you have a complaint number?

Question no. 4:

Then you would welcome an investigation by the N.Y. Attorney General, correct?

Question no. 5:

What specific and actionable threats were made in the June 15, 2017 video on BitChute?

Question no. 6:

What false claims have been made to law enforcement?

Thank you.

D.G. Sweigert
Evidence Collection Team

On 08/31/2020 7:43 AM Jason Goodman <truth@crowdsourcethetruth.org> wrote:

Mr. Sweigert,

You have no ability to make copies on YouTube, that functionality is provided by YouTube. You may not copy or upload a copyright claim however. You may, if you like, make your copyright notice available by linking to the original claim or the original post. Their presentation is accompanied by certain rules and guidelines which you must follow. You may not ever, intentionally or unintentionally, share, comment and/or forward links to copyrighted material, or copyrighted material, and/or reproduction of evidence in your ongoing effort to seek revenge for alleged wrongs done to you. You have falsely accused me of harassing George Webb. Sweigert is the attorney who represented me in Zapacunka. Other than my 10% of the failure to control charges and I believe been out of my way since 2014, that is not true. You have spanked yourself for more than 14 years on YouTube, you are, basically 0% and it amounts to you self and the public. As has already realized the F.C. Postal Service is coming to find me for the reason in the trial, either of myself or a Government agent. I do not think NYAG will pursue me in this. Since I am tried of being a 0% - you have a self interest and a desire to make a lot of noise. A George of course, who does not care about

We believe you have a valid claim against YouTube for copyright infringement. We are here to help you resolve your dispute and get your video removed from YouTube.

Please review the video you uploaded below. If you think your video is not infringing, please go to:

<https://www.youtube.com/watch?v=ElC3jJLwto>

You have engaged in unauthorized reprint, retransmission, distribution, or other acts of your own creation, in the course of business and derived from unauthorized user, deep your involvement, and intention to disrupt, harass, and interfere with your own legitimate authentication, making false claims, or misleading.

Jason Goodman
323-224-7294

On August 21, 2020 at 11:11 AM, YouTube received a complaint regarding the video(s) listed below:

Mr. Goodman

I would like to copyright strike against your company (and the person who uploaded this video) and I am sending you this notice under:

YouTube's Copyright Policy (available at https://www.youtube.com/policy?utm_source=youtube_main&utm_medium=internal&utm_campaign=Policy)

<https://www.youtube.com/watch?v=ElC3jJLwto>

To privately and independently verify my claim, I will file a written, non-public complaint that complies with the guidelines outlined. Your privacy is respected during this process. We will not share your identity or contact information for review of the uploaded video without your consent. YouTube provider, the uploader, 48 hours to take action on the complaint. If the uploader complies, the video, during those 48 hours, the complaint will be closed. If the uploader privacy complainant requests, we will extend 48 hours, the complaint will not be opened for review by the YouTube team. There is a high volume of patent complaints submitted, please be patient, your complaint will be carefully reviewed.

...

D.G. Swieger
Evidence Collection Team



sweigert-v-
goodm...20.pdf

(EXHIBIT D)

From: Spoliation Notice spoliation-notice@mailbox.org

Subject: Re: Youtube / Google Copyright litigation

Date: April 22, 2020 at 12:34 AM

To: Jason Goodman jason@21stcentury3d.com, Spoliation Notice spoliation-notice@mailbox.org

Cc: jasongoodman72@protonmail.com, copyright@youtube.com, copyright@patreon.com, legal@patreon.com, legal@support.youtube.com, privacy@patreon.com



See attached for your records

On April 11, 2020 8:00 AM Jason Goodman <jason@21stcentury3d.com> wrote:

D. George Sweigert has improperly used the "Crowdsource the Truth" trademark in the YouTube video in question in this dispute. D. George Sweigert, has engaged in an ongoing harassment campaign against Jason Goodman that has persisted since 2017 and has made substantial use of the YouTube account in question in furtherance of that harassment. Sweigert has made daily videos and publicized them throughout the world with his YouTube account including false claims, false allegations, threats and incitement of public hatred against Goodman. Sweigert's obsessive compulsion to focus so much negative attention on Goodman for such a protracted period of time, as well as public statements Sweigert has made about a family history of schizophrenia and gun ownership, have caused Goodman to fear for his personal safety and consider the possibility that Sweigert may be mentally ill.

As part of Swelgert's ongoing harassment, he initiated a lawsuit against Goodman in 2018. The claims Sweigert brings forth now intros YouTube claim are in dispute in this ongoing lawsuit. Sweigert is seeking improper judicial relief via his demand of YouTube. YouTube should deny Sweigert's effort to remove the video content in question until AFTER a judgement is issued in New York City, S.D.N.Y., 1:18-cv-08653-VEC-SDA Sweigert v. Goodman

The entity Sweigert references "MDSI" is unknown to Goodman and appears to be something Sweigerl has made up. Goodman is the CEO of Multimedia System Design, INC, the entity which owns the registered trademark that was improperly used by D. George Sweigert and Goodman submitted his complaint to YouTube as such.

Sweigert's usage of the trademarked logo is NOT covered by the Fair Use doctrine of the DCMA. Sweigert's video did not include commentary or criticism and was not a news report or other legitimate use. Lack of spoken or other commentary could easily cause a viewer seeing the trademarked logo to become confused and think Sweigerl's video had been made by or was endorsed by "Crowdsource the Truth". The mark was displayed along with other images and music which are also not the property of D. George Sweigert.

Sweigert's pattern of behavior constitutes malicious cyber stalking and cyber harassment. Sweigert should be denied further access to YouTube. Sweigert has used his YouTube account to repeatedly abuse the policies with regard to copyright usage and other community guidelines as set forth by YouTube in the end user license agreement.

D. George Sweigert has copied legal counsel for Patreon.com on this email. Patreon.com is an entity unrelated to YouTube or this matter. Sweigert has repeatedly harassed the management and legal counsel at Patreon.com in his ongoing effort to sabotage Goodman's business relationship with Patreon.com. Sweigert and his associates have made YouTube videos and posted YouTube comments publicly expressing their desire and ongoing effort to deplatform Goodman and destroy Goodman's reputation and business relationships with false claims and unsubstantiated accusations.

On Apr 10, 2020, at 3:56 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote:

For your records,

See attached.

As you know I am required to communicate my interest in resolving this matter with you prior to seeking relief from the S.D.N.Y. pending court case (see below).

This issue is related to a federal lawsuit presently pending in New York City, S.D.N.Y., 1:18-cv-08653-VEC-SDA Sweigert v. Goodman, regarding this matter.

The entity that filed this claim (M.D.S.I.) is apparently NOT an operational corporation in the State of New York and does not hold such a copyright. M.D.S.I. is ineligible to submit such a claim.

This video is also a FAIR USE production of a widely discussed public issue, Susan Holmes' arrest in Fort Collins, Colo. See "Susan Holmes arrested on warrant accusing her of perjury in red flag petition, Sadie Swanson, Fort Collins Coloradan, Published 8:44 p.m.". Ms. Holmes is a former side-kick of the person known as "Jason Goodman", believed to be the person who filed this copyright claim. Again, Jason Goodman can not demonstrate a lawful claim to this supposed "copyrighted material".

In accordance with Title 17 U.S.C. Section 107, the material on this site is distributed without profit to those who have expressed a prior interest in receiving the included information for research and educational purposes.

I am aware Jason Goodman is unable to provide evidence of M.D.S.I. is attempting to relate to for my filing of a Privacy Claim

It appears upon consideration of the above and by my authority as set forth in my Court's diversity jurisdiction by proceeding only against parties as to whom there is diversity of citizenship, the Court grants Plaintiff leave to re-file, within twenty-one days of the date of this order, a second amended complaint that complies with the requirements set forth herein."

A supplemental complaint shall be filed in Case 1:18-cv-08653-VEC-SDA Sweigert v. Goodman about this matter by the undersigned filing a letter motion for leave of the court to file a supplemental complaint.<Unhh5566556.jpg>

Case 3:17-cv-00601-MHL Document 191 Filed 04/16/20 Page 1 of 1 PageID# 2999

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ROBERT DAVID STEELE, et al.,

Plaintiffs,

v.

Civil Action No. 3:17cv601

JASON GOODMAN, et al.,

Defendants.

ORDER

This matter comes before the Court *sua sponte*. On April 10, 2020, in response to the COVID-19 outbreak, Chief U.S. District Judge Mark S. Davis issued General Order 2020-12, which, among other things, continues all civil and criminal jury trials and in-court appearances in the Eastern District of Virginia through June 10, 2020.

The jury trial in this matter is currently scheduled for May 5–7, 2020. In accordance with General Order 2020-12, and in the interest of justice, the Court CANCELS the current jury trial dates of May 5–7, 2020 and RESCHEDULES the jury trial in this matter for August 11–13, 2020. The Final Pretrial Conference SHALL take place on August 4, 2020. Counsel and Defendant Goodman SHALL abide by any instructions or requirements Judge Roderick C. Young may impose regarding the rescheduling of the Settlement Conference in this matter.

Let the Clerk send a copy of this Order to Judge Young and all counsel of record.

It is SO ORDERED.



M. Hannah Landy

United States District Judge

Date: 4/16/20
Richmond, Virginia

(EXHIBIT E)

From: Wills, Benjamin A. bawills@kaufcan.com
Subject: RE: improper 26f conference
Date: May 7, 2019 at 8:25 AM
To: Jason Goodman truth@crowdsourcethetruth.org
Cc: Frank, Terry C. tcfrank@kaufcan.com, Conrod, R. Johan rjconrod@kaufcan.com



Mr. Goodman,

We reached out to our client and she responded as follows:

Please respond that I did not tell Lutzke that Jason hit on underage girls. She leveled that accusation on her own, and tried to draw me in on it, but I did not have any knowledge of such activity and thus never made any such accusations.

Best,

Benjamin A. Wills
Kaufman & Canoles, P.C.
Two James Center
1021 East Cary Street, Suite 1400
Richmond, VA 23219-4058

T (757) 873.6302
F (888) 360.9092
bawills@kaufcan.com
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-----Original Message-----

From: Wills, Benjamin A.
Sent: Monday, May 6, 2019 4:04 PM
To: 'Jason Goodman' <truth@crowdsourcethetruth.org>
Cc: Frank, Terry C. <tcfrank@kaufcan.com>; Conrod, R. Johan <rjconrod@kaufcan.com>
Subject: RE: improper 26f conference

Mr. Goodman,

Please see the attached email regarding the time for the conference. As discussed, we take no position regarding whether it was properly scheduled. Please copy Ms. Frank and Mr. Conrod on all emails moving forward.

Thank you,

Benjamin A. Wills
Kaufman & Canoles, P.C.
Two James Center
1021 East Cary Street, Suite 1400
Richmond, VA 23219-4058

T (757) 873.6302
F (888) 360.9092
bawills@kaufcan.com
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-----Original Message-----

From: Jason Goodman [mailto:truth@crowdsourcethetruth.org]
Sent: Monday, May 6, 2019 3:48 PM
To: Wills, Benjamin A. <bawills@kaufcan.com>
Subject: improper 26f conference

Ben,

As per our phone call earlier today and based on emails prior to May 3, it is my understanding that you were notified of the improper 26f conference on or after 12:48pm eastern time May 2, 2019. Can you please confirm and include any emails you may have from Mr. Biss with regard to this conference.

Jason

The information contained in this electronic message is legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If you are not the intended recipient of this message, you are hereby notified that any use, distribution, copying or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Kaufman & Canoles at (757) 624-3000 or by return e-mail to helpdesk@kaufcan.com, and purge the communication immediately without making any copy or distribution.

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